

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL CASE NO.:
)	
KAYRICKA WORTHAM,)	1:23-cr-00131-MLB-RDC-2
)	
Defendant.)	
_____)	

UNOPPOSED MOTION TO CONTINUE SENTENCING

COMES NOW Defendant KAYRICKA WORTHAM, by and through undersigned standby counsel, and files this Unopposed Motion to Continue Sentencing. As grounds therefor, Ms. Wortham states:

1. On June 20, 2023, a grand jury sitting in the Northern District of Georgia returned a superseding indictment charging Ms. Wortham with one count of conspiracy to commit wire fraud in violation of 18 U.S.C. § 1349, two counts of wire fraud in violation of 18 U.S.C. § 1343, and two counts of forgery of signature of federal judge and seal of court in violation of 18 U.S.C. § 505 (Doc. 1).
2. On September 24, 2025, undersigned counsel was appointed as standby counsel to Ms. Wortham. (Doc. 324).

3. On October 6, 2025, Ms. Wortham pleaded guilty to one count of forgery of signature of federal judge and seal of court (count 24). (Doc. 336). This Court set a sentencing date of January 27, 2026. (No docket number).

4. Yesterday, Ms. Wortham asked undersigned standby counsel to file a motion for continuance of the sentencing. Ms. Wortham is diligently preparing her objections to the presentence report (“PSR”) while detained at the Robert A. Deyton Detention Facility and is consulting with undersigned standby counsel. However, Ms. Wortham indicated that she requires additional time to submit her objections and, given this Court’s requirement of five business days’ notice prior to sentencing for the filing of sentencing memorandum, she does not believe she will be able to timely prepare and file her memorandum once she receives the final PSR.

5. Therefore, Ms. Wortham requests a thirty-day continuance of the sentencing hearing.

6. Undersigned standby counsel communicated with AUSA Steve McClain and USPO Candice Logan who indicated they had no objection to this Court’s granting of this motion.

WHEREFORE Defendant KAYRICKA WORTHAM respectfully requests that this Unopposed Motion to Continue Sentencing be granted.

Respectfully submitted this 8th day of January, 2026.

/s/ Mark A. Campbell

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CERTIFICATE OF SERVICE
AND COMPLIANCE WITH LOCAL RULE 5.1B

I HEREBY CERTIFY that a copy of the foregoing was formatted in 14-point Times New Roman font in compliance with Local Rule 5.1B and was electronically filed this day with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all parties of record.

Respectfully submitted this 8th day of January, 2026.

/s/ Mark A. Campbell
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